



# St. Margaret's C of E. Primary School

## Safeguarding and Child Protection Policy

Last Update – September 2022 (Version 7.0)

Last approved by Governing Body – December 2022 (Version 6.0)

To be reviewed – September 2023 (or earlier in light of new legislation/LA guidance)

<b>Version</b>	<b>Date</b>	<b>Recipients</b>	<b>Purpose</b>
1.0	September 2016	All St. Margaret's staff and governors	New Safeguarding and Child Protection policy in line with new legislation (KCSIE 2016)
2.0	October 2017	All St. Margaret's staff and governors	Updated appendices to reflect recent guidance and LA audit (June 2017)
3.0	October 2018	All St. Margaret's staff and governors	Updated to reflect KCSIE 2018. Added appendices on specific safeguarding issues and auditing paperwork.
3.1	November 2018	All St. Margaret's staff and governors	Updated to include reference to child criminal exploitation (County Lines)
4.0	September 2019	All St. Margaret's staff and governors	Updated to reference KCSIE 2019 – Section 128 checks, upskirting, off-rolling, serious violent crime and reference new relationships education requirements and DfE online guidance.
5.0	September 2020	All St. Margaret's staff and governors	Updated to reference KCSIE 2020 – Added additional guidance on mental health, child criminal exploitation and child sexual exploitation and link to new Child Protection Coronavirus Addendum Included new guidance on supporting children with social workers and those who require mental health support. Alteration to managing allegations procedure, including supply staff. Added an additional appendix on online safety.
6.0	September 2021	All St. Margaret's staff and governors	Updated to reference KCSIE 2021: <ul style="list-style-type: none"> <li>• Changes regarding safeguarding information for all staff: new information on what staff should be alert to; new expectations around child-on-child abuse and the different types; new information on child criminal exploitation (CCE) and child sexual exploitation (CSE)</li> <li>• Changes regarding the management of safeguarding: new information on responsibilities for headteachers, DSL teams and governors; new information on training; online safety updated information;</li> <li>• More detail on safer recruitment measures: more information on recruitment processes and pre-employment checks; new information on the single central record; new information on making referrals to the DBS</li> <li>• Updated guidance on handling allegations against staff</li> </ul> additional section on allegations that don't meet the harms threshold; updated guidance on initial response to an allegation <ul style="list-style-type: none"> <li>• More detail on child-on-child sexual violence and sexual harassment</li> </ul>
7.0	September 2022	All St Margaret's staff and	Updated to reference KCSIE 2022: <ul style="list-style-type: none"> <li>• Added new information about domestic abuse</li> <li>• Changed peer-on-peer abuse to the new name – child-on-child abuse for consistency and to</li> </ul>

		governors	highlight that there can be an age imbalance whereas peer-on-peer suggests that children are the same age. Added information about online safety Added information about 'professional curiosity' to reference September 2022 training.
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Page | 3

## Contents

Key Contacts for Safeguarding and Child Protection at St Margaret's Church of England Primary School	<b>3</b>
1. Purpose of the policy	<b>4</b>
2. Safeguarding Children	<b>7</b>
3. Definitions	<b>8</b>
4. Equality Statement	<b>8</b>
5. Responsibilities	<b>9</b>
6. Confidentiality	<b>13</b>
7. Recognising abuse and taking action	<b>14</b>
8. St Margaret's referral model	<b>20</b>
9. Record keeping	<b>21</b>
10. Pupils with special educational needs and disabilities	<b>23</b>
11. Looked after children and previously looked after children	<b>23</b>
12. Mobile phones and cameras	<b>24</b>
13. Complaints and concerns about safeguarding procedures	<b>24</b>
14. Training	<b>25</b>
15. Monitoring arrangements	<b>26</b>
<b>Appendices</b>	
1. Child welfare concern/child protection concern recording sheet	<b>27</b>
2. Information sharing guidance	<b>29</b>
3. Recognising abuse	<b>31</b>
4. Specific safeguarding issues (based on Annex A advice in KCSIE, 2021)	<b>33</b>
5. Online Safety (based on Annex D advice, KCSIE, 2021)	<b>40</b>
6. Safer recruitment and DBS checks	<b>42</b>
7. Allegation of abuse against staff procedures	<b>46</b>
8. PREVENT – addressing concerns	<b>53</b>
9. Audit tool for auditing written records (including the SCR)	<b>54</b>
10. Checking whether the Single Central Record meets requirements	<b>56</b>

## Key Contacts for Safeguarding and Child Protection at St Margaret's

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Page | 4

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**Local Authority Designated Officer (LADO):** Collette Morris  
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## 1. Purpose of Policy

This policy sets out how the Governing Body of St Margaret's Primary School is carrying out its statutory responsibility to safeguard and promote the welfare of children in accordance with Section 175 of the Education Act 2002. Safeguarding and promoting the welfare of children is **everyone's responsibility** who works or volunteers at St Margaret's. Consequently, everyone who comes into contact with our children has a role to play in safeguarding and child protection. In doing so, all staff and volunteers should make sure their approach is child-centred. This means that they should consider, at all times, **what is in the best interests of the child**. Their welfare and safety is at the heart of our vision for providing 'A Place to BECOME' for each and every child. In this policy, a 'child' means all children and young people under 18 years of age.

We recognise that because of the day to day contact with children, school staff and volunteers are well placed to observe signs of harm, abuse, neglect, victimisation and/ or exploitation. The school will therefore ensure arrangements are in place to safeguard and promote the welfare of children by:

- Maintaining an environment where all children feel secure, are encouraged to talk, and are listened to
- Ensure all children know the adults in the school who they can approach if they have worries
- Teaching students to keep themselves safe – increasing their awareness of different forms of harm and abuse as appropriate to their age – better enabling them to seek help if needed.
- Appointing senior members of staff to fulfil the roles of designated and deputy safeguarding leads
- Providing effective, ongoing training and development for all staff that is integrated, aligned and considered as part of the whole school safeguarding approach.

- Training ensures that all staff are aware of indicators of abuse and neglect to allow early identification and specific safeguarding issues (see section 7 and appendix 4) so that staff are able to identify cases of children who may be in need of help or protection.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage - developing effective links with relevant agencies in all matters regarding safeguarding and child protection
- Monitoring and supporting children who are subject to child protection plans, contributing to the implementation of the plan
- Keeping meticulous, written records of concerns about children, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely
- Ensuring the suitability of all staff through safer recruitment practice
- Ensuring all staff and volunteers understand their responsibilities with regard to safeguarding and child protection
- Ensuring that parents and carers have an understanding of the responsibility placed on the school and its staff for safeguarding and child protection
- Maintaining awareness of those children who are persistently absent or missing from school, notifying the local authority in line with 'Children Missing in Education' protocols
- Maintaining clear procedures for reporting allegations against staff members

Page | 5

We recognise that some children are living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes. Some may need early help or intervention from other organisations in order to overcome problems and keep them safe. Children may need social worker due to safeguarding or welfare needs, such as abuse, neglect and/or complex family circumstances. Please see Section 10 for information on children with **Special Educational Needs or Disabilities and Section 11 for children who are Looked After**. At St Margaret's in creating 'A Place to BECOME', we aim to provide all children a stable, secure and predictable environment and will ensure we support all children through:

- Appropriate staff conduct (in line with relevant policies and staff handbook)
- Relevant curriculum design and implementation to teach pupils about staying safe at all times, including when they are online
- Daily practice underpinned by the St Margaret's vision 'Providing each child with A Place to BECOME : A Learning Community sharing God's faith, hope and love
- Consistent implementation of the school's anti-bullying, behavior, online safety, safer recruitment and related policies, including additional DfE guidance as appropriate, for example [DfE new Sept 2019 online safety](#), [DfE Guidance on Preventing Bullying, Sept 2020](#), [Mental Health and Behaviour in schools DfE Sept 2020](#), [Public Health England - Promoting emotional health and wellbeing](#) and [Public Health England Sept 2020 Every Mind Matters Campaign Sept 2020](#)
- Ensuring that online safety is a running and interrelated theme throughout policies and procedures: considering how it is reflected as required in all

relevant policies; considering online safety whilst planning the curriculum, and teacher training; and the role and responsibilities of the designated safeguarding lead and any parental engagement.

- Effective health and safety policy and practice, including the biannual audit by external consultant.
  - Close liaison with other agencies such as social care, Healthy Young Minds, Psychology Services and Early Help.
  - Ensuring that, where a child is subject to a protection plan, their information is securely transferred to any new school immediately and that the child's social worker is informed.
  - Ensure children with a named social worker aren't vulnerable to further harm or experience additional barriers to attendance, learning, behavior or mental health.
  - Consistent and positive behavior management, in line with school policy. At St Margaret's we use internal and external exclusions only as a last resort for students deemed as vulnerable or at risk. We never off-roll children.
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### 1.1 Related Policies

Safeguarding covers more than the contribution made to child protection in relation to children. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, building security, positive behavior management and the use of physical intervention and restraint (reasonable force). As a result this policy must be read, used and applied alongside the policies mentioned above as well as both the school's bi-annual Safeguarding Audit and annual PREVENT self-assessment. An additional appendix (appendix 5) was added to this policy in March 2020 as schools increasingly worked online. This new appendix is based on the guidance provided in KCSIE and was designed to support schools in keeping children safe online (including when they are online at home).

Addendums to this policy were added in March 2020 and updated in September 2020 covering how pupils were to be safeguarded when working at home. Whilst this is not necessary currently, should arrangements change in the academic year 2022/23, this would be the case again.

There may be safeguarding issues that are specific to the local area or population that need to be identified in partnership with the **3 safeguarding partners** and/or other agencies, for example, gang membership, Female Genital Mutilation, Child Sex Exploitation, extremism and the safeguarding of vulnerable adults. See page 3 for LCSB contact details. All staff will be made aware of specific issues relating to the locality that could impact on the safety of children at the school as appropriate. This will be achieved via staff meetings/briefings, bulletins, training and development.

The Single Central Record (SCR) is an important part of the school's commitment to safeguarding and will be monitored by the safeguarding lead on a termly basis and discussed with the nominated governor in their work to

challenge and review the impact of leaders to sustain effective safeguarding at the school. Even staff who only work at the school for a day are added to the SCR and details are removed once the individual no longer works at the school. Section 8 includes a copy of the auditing tool used to monitor the SCR. The SCR will be overseen and directly managed by the Headteacher, who is ultimately responsible for safeguarding in the school and the designated safeguarding lead.

## 2. Safeguarding Children

### 2.1 Safeguarding covers a broad range and aims to achieve the following:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health and/or development
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

### 2.2 As part of meeting a child's needs, the school:

- Recognises the importance of information sharing between professionals and other agencies as vital in identifying and tackling all forms of child abuse, including the prevention of child sexual exploitation, trafficking, female genital mutilation, forced marriage and radicalization.
- Will ensure any fears about sharing information **will not be allowed** to stand in the way of protecting the safety and welfare of any child
- Will identify children who may be suffering from significant harm and make child protection referrals
- Identify children who need extra help – those that have health conditions, a mental health need, a family member in prison or affected by parental offending, at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the school day) - and make appropriate referrals, including to the early help service, to prevent concerns escalating

We will therefore follow the procedures set out in this policy, and in accordance with the 3 safeguarding partners' [child protection procedures](#) and the statutory guidance as follows:

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education 2022, Working Together to Safeguard Children \(Feb 2019 version\)](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

### 3. Definitions

**Child protection** refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed

to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence. Children who witness domestic abuse are also victims.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

## 5. Responsibilities:

Safeguarding and promoting the welfare of children is **everyone's responsibility**. Additionally, schools have an important role to play in supporting the mental health and wellbeing of their pupils. Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact and it's key that staff are aware of how these experiences can affect children's mental health, behavior and education. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to the extended school and any off-site activities.

### 5.1 All Staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. They will be professionally curious and are encouraged to adopt an 'It could happen here' mindset.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to the local authority children's social care team and for statutory assessments that may follow a referral, including the role they might be expected to play

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- Have an awareness that mental health problems can in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and take action on mental health concerns that are also safeguarding concerns by following this policy and the procedures set out in it by speaking to the DSL.
- Know the indicators of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalization to identify cases of children who may be in need of help or protection. If staff are unsure they should **always** speak to the DSL.
- The importance of being vigilant as multiple safeguarding issues will overlap with one another
- The fact that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)

Section 14 and Appendix 3 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mrs Rachel Whittle. The DSL takes lead responsibility for child protection and wider safeguarding.

If the DSL is absent, the deputies – Mr Daniel Whittle and Mrs Shelley Greenwood – will act as cover. In exceptional circumstance, if the DSL and deputies are not available, this must not delay action, the next most senior member of staff will act as cover. In these circumstances any action should be shared with the DSL as soon as is practically possible.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters. Including sharing information about the welfare, safeguarding and child protection issues, including those relating to online safety, that children are experiencing or have experienced with staff. This could be done by, for examples:
  - Making sure that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for them.
  - Supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Work with the mental health leads where safeguarding concerns are linked to mental health

- Promote supportive engagement with parents and carers.
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL will co-ordinate action on child protection within the school. This includes ensuring that all staff, teaching and non-teaching (including supply staff) know who the Designated Safeguarding Lead is and that they are aware of their individual responsibility to be alert to the signs of abuse and to discuss any concerns with the DSL. Also that they are aware of what happens once a concern has been raised.
- Where appropriate the Designated Safeguarding Lead will liaise with the DSL of the school(s) attended by the siblings of the child causing concern.
- The DSL will keep a written record of any actions taken as a result of concerns raised.
- The DSL for Child Protection will ensure that the school's child protection policy is put on the agenda of the Governing Body once a year for discussion, monitoring, review and renewal.
- The DSL will hold information about which children have social workers and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:
  - Responding to unauthorised absence or missing education where there are safeguarding risks
  - The provision of pastoral and/or academic support

Page | 11

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and deputies are set out in their job description and in Annex C: role of the DSL, Keeping Children Safe in Education 2022.

### 5.3 The governing body

The governing body will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation. They will facilitate a whole school or college approach to safeguarding: safeguarding and child protection is 'at the forefront' and underpins all relevant aspects of processes and policy development. The governing body will appoint a lead governor to monitor the effectiveness of this policy in conjunction with the full governing body. This is always a different person from the DSL. The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

All governors will hold an enhanced criminal records certificate from the DBS and from September 2019 school will carry out a section 128 check for school governors. In addition, to the above and reading the relevant sections of Keeping Children Safe in Education, the governing body will:

- Ensure the DSL for child protection undergoes updated child protection

training every two years.

- Ensure a copy of the child protection policy is on the school website
- Support the Designated Safeguarding Lead in carrying out his/her responsibilities as outlined in [Keeping Children Safe in Education September 2021](#)
- Ensure the Headteacher and all staff members undergo whole school child protection training in line with Oldham LA requirements.
- Consider how children may be taught about safeguarding as part of a broad and balanced curriculum, including as part of Relationships Education from September 2020.
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, children who have been abused and some children with SEND.
- Ensure that there is a dedicated teacher for Looked After Children who has been appropriately trained. This staff member has a key role in promoting the educational achievement of Looked After Children and engaging with the DSL.
- Ensure the child's wishes and feelings are taken into account.
- Ensure that there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate as well as clear referral and accountability systems.
- Ensure appropriate safeguarding responses to children who go missing from educational settings, particularly on repeat occasions.
- Regularly review the school premises to ensure that it is a safe environment and that where building work is taking place any additional risk assessments that are required are completed to take account of safeguarding arrangements.
- Ensure the agenda of Governing Body meetings reflect safeguarding issues as and when appropriate.
- Ensure that the school operates safe recruitment procedures in line with national and local guidance and that it monitors the process – see appendix 6.
- Ensure that the school has a procedure for managing of allegations against adults who work with children (including volunteers and supply staff) and that it is implemented and monitored (including a nominated governor who will liaise with the Local Authority, on issues of child protection and in the event of allegations of abuse made against the Headteacher. See appendix 7 for more information).
- Ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#) and guidance from Oldham Safeguarding Partnership.
- Seek to ensure that children are safeguarded from potentially harmful and inappropriate online material (including when they are online at home). The governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

#### 5.4 The headteacher

The headteacher is responsible for the implementation of this policy,

including:

- All the school's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, including supply staff or staff employed through an agency, where appropriate (see appendix 7)
- Ensuring the relevant staffing ratios are met, where applicable

## 6. Confidentiality

- Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Staff will not promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information (see appendix 2)
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 9, and allegations of abuse against staff in appendix 7.

### DATA PROTECTION AND SHARING SAFEGUARDING INFORMATION – GDPR

The General Data Protection Regulation (GDPR) and the Data Protection Act (2018) does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare. Processing safeguarding data is necessary for compliance with our legal obligations: consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities. Keeping children Safe in

Education 2022, clarifies that organisations may refuse to share data if a serious harm test is met, for example in a situation where a child is in emergency accommodation, withholding providing the address would be in compliance with schools' obligations under the DPA, 2018. There are further links to support schools with information sharing in KCSIE 2022, including links to the DFE's data protection toolkit.

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Page | 14

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

Staff adopt a culture of 'It could happen here' with regards to safeguarding and are always encouraged to use their professional curiosity. They are aware that children might not be ready or know how to tell someone about abuse they've experienced. They might be embarrassed, humiliated or threatened not to tell anyone about their abuse. In addition, children might not recognise their experiences as harmful. Furthermore, their vulnerability, disability, sexual orientation or any language barriers could also be reasons why they don't tell someone about their experiences

The barriers above will not stop staff being professionally curious and sharing any concerns about a child with the DSL.

### 7.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger.

**Anyone can make a referral.** Use the NSPCC guidance for schools and colleges - When to call the police.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

#### **Contact details for a referral for children residing in Oldham:**

**Children's Assessment Team -**

**0161 770 7777**

**0161 770 6936 (Out of Hours)**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or

person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen carefully, reassure the child that they are being taken seriously and that they will be supported and kept safe. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset – the child shouldn't be given the impression they are creating a problem or made to feel ashamed for making the report.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible (using the school proforma - see appendix 1) and in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

Page | 15

## 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out.

Staff should not examine pupils. Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

## 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, speak to a member of the senior leadership team and/or take advice from local authority children's social care.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

### **Early help**

If early help is appropriate, the DSL will support an appropriate member of staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

## 7.5 If you have concerns about extremism – see appendix 8 for locally agreed procedures to address a PREVENT concern

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

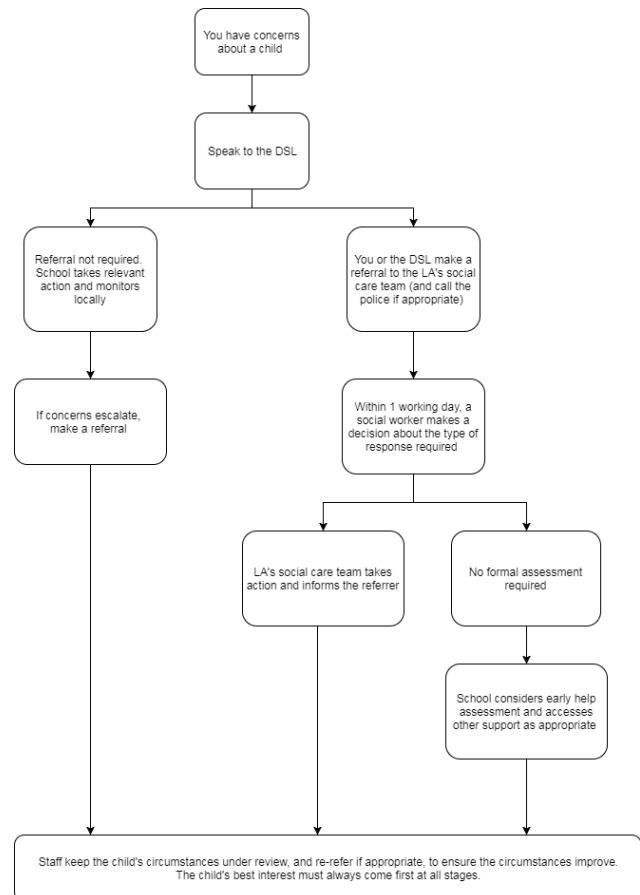
If in exceptional circumstances the DSL is not available, speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger



- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Appendix 8 contains a flowchart around addressing concerns around the welfare of an individual/groups of children being drawn into extremism.

#### 7.6 Concerns about a staff member or volunteer

Page | 17

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer (including those employed through a supply agency) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors or the LADO (Local Authority Designated Officer).

The headteacher/chair of governors will then follow the procedures set out in appendix 7, if appropriate.

#### 7.7 Allegations of abuse made against other pupils – child-on-child abuse

We recognise that children are capable of abusing their peers – inside or outside school or online. There will be a zero-tolerance approach to abuse – it will never be passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.

We will be aware that children can abuse their peers online through:

- Abusive, harassing and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups.
- Sharing of abusive images and pornography, to those who don't want to receive such content.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the child and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child-on-child abuse by:

- Ensure that staff understand the importance of challenging inappropriate behaviours between peers to ensure that a safe environment is created and that a culture doesn't develop where abuse is normalized. Any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images will be challenged.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Ensuring staff recognise the indicators of child-on-child abuse, know how to identify it and respond to any reports.
- Recognise that child-on-child abuse may be taking place, even if not reported.
- Ensure staff understand their role in prevent child-on-child abuse and responding to it if they believe a child may be at risk.

### 7.8 Sexting

**Sexting** is when a young person takes an indecent image of their self and sends this to their friends or boy/girlfriends via mobile phones. These images are then shared between other young people and/or adults via a mobile phone or website with people they may not even know.

#### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

#### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response

- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any person in the imagery is under 18
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

#### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the local PCSO and/or SPOC.

#### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 9 of this policy also apply to recording incidents of sexting.

#### **Curriculum coverage**

Where appropriate to pupils age and maturity they are taught about the issues surrounding sexting as part of our PSHE education and computing programmes.

## **8. St Margaret's referral model:**

The statutory referral process is outlined in the updated 'Keeping Children Safe in Education' (September 2022).

### St Margaret's C of E Primary School's referral model

- Any member of staff who has concerns about the safety or potential abuse (see appendix 3) of a child must report their concerns to the Designated Safeguarding Lead for Child Protection without delay. This includes allegations made against other children.
- Members of staff should make a written account of any concern they have regarding the welfare or well-being of a pupil using the school pro forma including making a note of any visible marks and injuries (see appendix 1: example pro forma and appendix 2: guidance for staff on making Child Protection records)
- The DSL will need to make a professional judgement about what action needs to be taken, in accordance with the Oldham LA safeguarding procedure.
- The DSL should feedback to the member of staff sharing the concerns any decisions that they make in relation to action to be taken. If the member of staff does not agree with the decision of the DSL and feel that a child is at risk of significant harm they have an individual responsibility to make a referral themselves
- In accordance with the [Local Safeguarding Children Board Procedures](#), the agreement of the family for a referral to Children's Services Referral and Advice Team should normally be sought where possible, ([Chapter 3.1.Section 13.1](#)). **However**, if it is felt that seeking any such agreement would increase the level of significant risk to the child, the matter should be discussed with the Referral and Advice team and their advice sought. This must not contribute to a delay in making a referral. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.
- All referrals need to be confirmed in writing as soon as possible using the form online
- Where the child does not reside in Oldham the Referrals must be made to the appropriate to cross border Local Authorities these must also be confirmed in writing to – Oldham Safeguarding Board, Rock Street, Oldham, OL1 3UJ.
- If there is a professional disagreement regarding the outcome of a referral to Referral and Advice Team the DSL should follow the LA professional disagreement protocol and escalate their concerns
- The school will ensure that the relevant social worker is notified if there is an unexplained absence of a pupil who is currently subject to Section 47, (a child protection plan or a child in need plan)
- When discussing concerns in respect of a child who is Looked After by the Local Authority in addition to consulting with/referring to referral and advice team, the child's named social worker must be informed of the referral

- A chronology of significant events will be kept on the child's individual file which is stored securely online.
- The school will ensure that an appropriate member(s) of staff will attend any child protection meetings called by the Child Protection and Review Unit in respect of a child attending the school
- The school will ensure that a written report on the appropriate template is submitted to all initial and review Child Protection case conferences.
- The school will ensure appropriate members of staff contribute to and attend core group meetings where children in school are subject to a Child Protection Plan.

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Page | 21

### 8.1 Notifying parents

Where appropriate we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a concern or disclosure. Other staff will only talk to parents about any such concerns following a consultation with the DSL. If we believe that notifying parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all children involved.

### 8.2 Evaluating and monitoring processes

The DSL/SLT/Governors will undertake regular quality assurance checks on child protection cases, files and processes in school (see appendix 9 for an internal audit tool that is used as part of this process). In addition, the DSL will complete both the Oldham LA Section 11 audit biannually, and the Oldham LA PREVENT self-assessment on an annual basis: the results of which (and progress against any actions) will be shared with both the local authority and governing body.

## **9. Record Keeping**

We will hold records in line with our records retention schedule. All safeguarding concerns, discussion, decision made and the reasons for those decisions must be recorded in writing. If there is any doubt whether to record something then advice must be sought from the DSL.

The importance of good clear child welfare and child protection record keeping has been highlighted in the learning from serious case reviews. Good up to date record keeping of concerns and action taken is essential for two main reasons:

- It helps schools identify causes for concern at an early stage. Often it is only when a number of seemingly minor issues are seen as a whole, that a pattern can be seen indicating safeguarding or child protection concern.
- It helps schools monitor and manage their safeguarding practices and provides evidence of robust and effective safeguarding policy and practice

A record of a concern, suspicion or allegation should be made at the time of or as soon as possible after the event. Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible

abuse in a child or young person, will make a written record within the hour recording the disclosure using the child's own words, what was said or seen and the location both of the abuse and the disclosure. Dates and times of events should be recorded as accurately as possible, together with a note of when the record was made. (See appendix 1 model pro forma and appendix 2 Guidance to school staff when making a record of a child protection incident or concern)

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Page | 22

- A record should be made of any visible marks or injuries to a child that gives cause for concern, this may be completed on a body map (appendix 1). The child should not be examined intimately or pictures taken of any injuries/marks.
- All records must be signed and dated clearly with the name of the signatory clearly printed.
- Children **MUST NOT** be asked to make a written statement themselves or to sign any records.
- All records of a child protection nature (handwritten or typed) are given to the DSL. These are added to the cloud based electronic storage system (CPOMS) and the paper-based records are destroyed. Access to the electronic records is limited to the DSL and deputies. However, details of a case may be shared on a need to know basis with appropriate people as necessary to allow them to safeguard the pupils/carry out their own duties. This will be decided on a case by case basis.
- Any contact with other agencies must be recorded as should the rational for sharing or not sharing information.
- Child Protection records must be securely held, separate from the main pupil file, and in a secure place.
- The DSL will need to be aware whether the child has any sibling(s) at other schools or early year's settings and consider whether information is such that it should be shared with that other setting.

**All staff to follow the seven golden rules of information sharing (DfE March 2015 - see appendix 2)**

In addition:

- Appendix 6 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
- Appendix 7 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

#### 9.1 Transfer of pupil records

- When a child who has a child protection plan leaves the school and/or transfers to another school, the DSL will inform the child's new school immediately and discuss with the child's social worker the transfer of any confidential information the school may hold.
- When a child who has a child protection file in school leaves a school and transfers to a new school (mid-year transfer/infant to Junior/Primary to secondary) the DSL of the current school should review the child protection file and should pass the following to the DSL of the new school :
  - Any current concerns that are being monitored.

- Most recent Child Protection Conference minutes
- The following information should be dealt with in line with the schools file retention policy
  - Any historical information such as monitoring notes that is older than the current academic year and did not result in either a discussion with Referral and Advice for advice or a child protection referral
- When a pupil is educated off site by an alternative provider or is dual registered the DSL for the home school should assess what information the DSL for the provision where the child attends requires based on amount of time the child spends at the other provision and the nature of the provision is. Where appropriate the DSL at the alternative provision will receive a copy of the pupils child protection file as detailed above.
- When a child ceases to be of statutory school age or leaves college their records should be retained by the said establishment until the child's 25<sup>th</sup> birthday.

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Page | 23

## 10. Pupils with special educational needs and disabilities

We fully recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

In previous versions of KCSIE, schools were told that they should take into account the safeguarding needs of children with SEN and disabilities. The more recent guidance goes a little bit further and outlines what that means. There is a concern sometimes that, for children with SEN and disabilities, that their SEN or disability needs are seen first, and the potential for abuse second. If children are behaving in particular ways or they're looking distressed/their behaviour or demeanour is different, staff should think about the potential of abuse, and not simply see it as part of their disability or their special educational needs.

Safeguarding children and young people with SEN requires understanding, foresight and reflection. Keeping children safe from harm in schools relies on all staff being able to recognise the raised risk factors, identify young people with the greatest level of risk and create focussed action plans and profiles that sufficiently respond to their needs.

We offer extra pastoral support for pupils with SEN and disabilities: details of which can be found on our school website as part of our St Margaret's Local Offer 2022/23. Details of the Oldham Council SEND Local Offer can be found [here](#).

## 11. Looked After Children and Previously Looked After Children

All staff should have awareness of issues around safeguarding looked after and previously looked after children. Leaders' should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. A previously looked after child remains vulnerable and it is important that all agencies work together to ensure that prompt action is taken on concerns to safeguard this particularly vulnerable group.

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Page | 24

Staff need to be aware of the legal status of a looked after child's care arrangements. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school lead in the authority that looks after the child.

The Headteacher must appoint a designated teacher to promote the educational achievement of children who are looked after and previously looked after and ensure that this person has appropriate training. The designated teacher is also responsible for promoting the educational achievement of children who have left care.

#### Liaison with the virtual school head

Virtual school heads receive pupil premium plus additional funding based on the latest published numbers of children in the authority. The school's designated teacher for looked after and previously looked after children will work with the virtual school head to monitor the child's welfare and discuss how funding can best be used to support the progress of the child and meet the needs identified in the child's personal educational plan.

### **12. Mobile phones and cameras**

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. Further details about use of mobile phones and cameras can be found in the staff handbook.

### **13. Complaints and concerns about school safeguarding policies**

#### Concerns relating to a member of the school staff or other person in a Position of Trust:

- If the suspicions in any way involve a member of staff, the matter should to be brought to the attention of the Headteacher immediately who will act in accordance with the local authority procedures i.e. by discussing the allegation with the Local Authority Designated Officer (LADO) **as soon as**

**possible.** Collette Morris is the LADO for Oldham and can be contacted on 0161 770 8870.

- If the suspicion involves the Headteacher, advice needs to be sought from the LADO. The Chair of the Governing Body is to be informed immediately. In addition to being contained at the front of this policy, the telephones numbers for both the Chair of Governors and the LADO are displayed in all staff areas around school.
- The Headteacher or designated deputy headteacher will attend any Position of Trust meetings relating to allegations against staff.

See appendix 7 for our procedures for dealing with allegations of abuse made against staff.

### 13.1 Whistle-blowing

Please refer to the school's whistle-blowing policy which covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

Alternatively, you can contact the [NSPCC whistleblowing helpline](#).

## **14. Training**

This school is committed to supporting and training all staff in matters of safeguarding and child protection. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

**Upon appointment and at yearly intervals, staff will be issued with the latest version of part 1 of 'Keeping Children Safe in Education' entitled 'Safeguarding Information for All Staff'.**

- The governors will ensure that all staff receive appropriate induction and training to equip them to carry out their responsibilities for safeguarding effectively as prescribed in government guidance (Section 175 of Education Act 2002) and in accordance with the standards set by the LA competency framework. This will mean the school setting aside a half-day training session at least every 3 years for whole school child protection training. Those staff who join the school in the intervening years will be made aware of their responsibilities with regards to safeguarding and the school policy and procedures as part of their induction. The induction briefing would usually be carried out by the DSL.
- The Governing Body will ensure that the DSL for Child Protection attends the multi agency safeguarding Level Two training organised through the LA within 12 weeks of taking up their responsibilities and that the DSL subsequently attends appropriate training on a 2 yearly basis in accordance with government guidance. The school will ensure that its DSL attend the DSL Annual Training Conference at least once every other year.
- A written Code of Staff Conduct, shared with all staff and forms part of induction for new staff.

- All staff will have training on the government's anti-radicalisation strategy, Prevent biannually, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

#### 14.1 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake annual Prevent awareness training.

#### 14.2 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. **Upon appointment and at yearly intervals, governors will be issued with a copy of the latest version of part 1 of 'Keeping Children Safe in Education' entitled 'Safeguarding Information for All Staff'.** In addition, governors will all complete the Channel Prevent awareness training upon commencement of their position.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

#### 14.3 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

### **15. Monitoring arrangements**

This policy will be reviewed **annually** by Mrs Rachel Whittle (Deputy Head/Designated Safeguarding Lead). At every review, it will be approved by the full governing body. See section 8.2 for details regarding how the safeguarding policy and procedures are monitored.

## Appendix 1

### Model Child Welfare Concern and Child Protection concern/disclosure form

To be completed by school staff or volunteer when they become aware of any child welfare or child protection concern. The completed form should be handed to the DSL without delay.

Page | 27

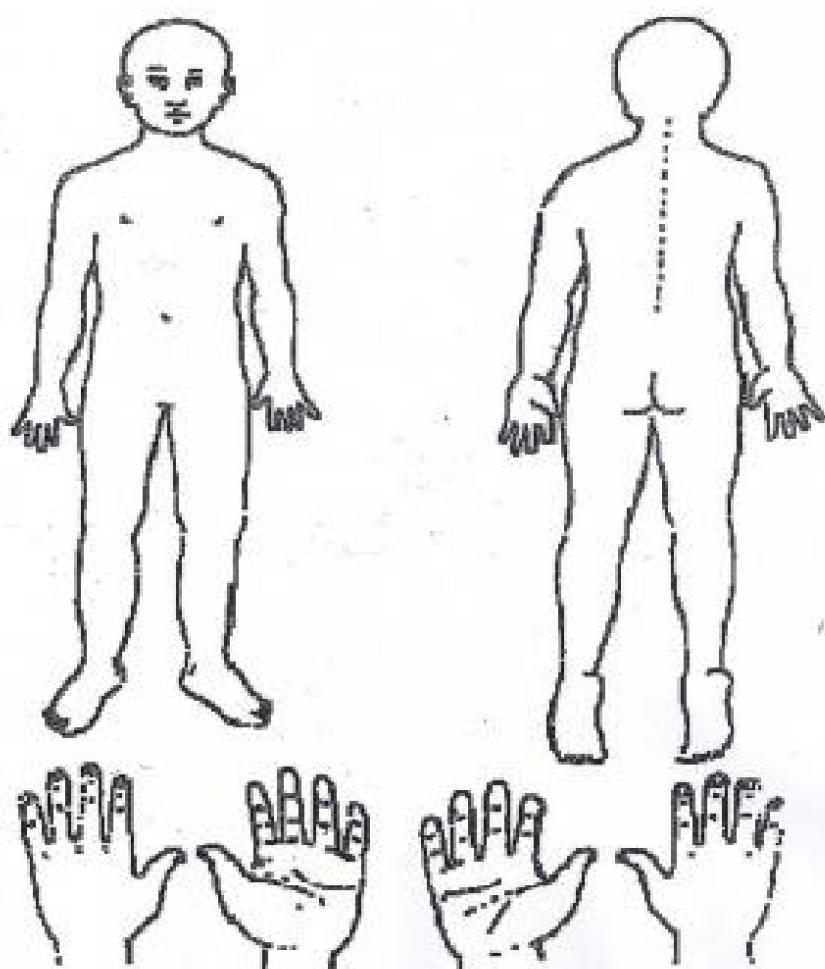
<b>Name of child:</b>	<b>DOB of child:</b>
<b>Year Group:</b>	<b>Class / tutor group:</b>
<b>Name and role of person making this record:</b>	
<b>Date:</b>	<b>Time:</b>
<b>Nature of Concern:</b> (Including any injuries/marks. These should also be recorded on the body map overleaf)	
<b>Observations made / Professional opinions:</b> Please make distinction between fact and opinion	
<b>What the child said in their own words:</b>	
<b>Action taken by person making this record:</b>	
<b>Signature</b>	<b>Date</b>
<b>Information Reviewed by DSL and actions taken:</b> (including rational for decisions made)	
<b>Signature</b>	<b>Date</b>
<b>Final outcome:</b>	
<b>Signature</b>	<b>Date</b>
<b>Summary of any feedback given to member of staff raising original concern</b> (including rational for information sharing)	

Name of child.....

Date of use of body map: .....

Name of staff member: .....

**Body Map**



## **Appendix 2**

### **Guidance when making a record of a child protection incident or concern and info sharing**

You won't know when making child protection note, who will eventually have access to it when. It may be consulted months or even years after it was written. Always bear in mind that someone who is a complete stranger to you and your school may need to read your record at some stage in the future.

Ideally, logs of incidents should be typed. Hand written notes should be clearly legible and written in ink. All notes and reports must contain the following:

- Date of the incident
- Date and time of the record being made (remember to include the year)
- Name and date of birth of the child(ren) concerned
- A factual account of what happened, and the location where the incident took place (include the actual words spoken by the child where possible)
- A note of any other people involved e.g. as witnesses
- Action taken, and any future plans e.g. monitor and review
- Any other agencies informed?
- Printed name of the person making the record
- Job title of the person making the record
- Signature (print name alongside)

You should identify the source of your information e.g. 'Ms Terry, a teaching assistant, told me that....' Or 'I saw Rowan in the playground at break time...'

Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (e.g. 'Jenny was crying and rocking' rather than 'Jenny was upset').

Distinguish clearly between fact and your professional opinion. When recording your professional opinion, make it clear what your opinion is based on (e.g. 'Harry ran and hid under the table when his mother arrived to take him home, and clung to me when I tried to get him out. He appeared to be frightened.')

Make a note of what you have done with the information (e.g. 'I consulted the Designated Safeguarding Lead, Mrs Whittle, and she said she would...')

Try to avoid specialist jargon (e.g. 'he is on SEN stage 3') which someone from another agency would not necessarily understand.

## The seven golden rules to sharing information

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose

### Recognising Abuse

In the Children's Acts 1989 and 2004, **a child** is anyone who has not yet reached their 18th birthday, or 19<sup>th</sup> birthday for SEN.

Page | 31

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2013) as:

- protecting children from maltreatment;
- preventing impairment of a child's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (e.g. sexual exploitation, criminal exploitation, serious youth violence). Children may be abused in a family, or in an institutional or community setting by those known to them or, more rarely, by a stranger, e.g, via the internet. They may be abused by an adult or adults, or another child or children. Children with special needs of disabilities are particularly vulnerable, with a range of risks including: attitudes and assumptions – e.g. a reluctance to believe disabled children are abused; minimising the impact of abuse; and attributing indicators of abuse to the child's impairment; barriers to the disabled child and their family accessing support services; issues related to a child's specific impairment – e.g. dependency on a number of carers for personal or intimate care; impaired capacity to resist/avoid abuse, difficulties in communicating; and an inability to understand what is happening or to seek help; limited opportunities for disabled children to seek help from someone else.

The Children Act 1989 introduced the concept of **significant harm** as the threshold that justifies compulsory intervention in family life in the best interests of a child, and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

**The following information is based on the Department for Education's statutory guidance, Keeping Children Safe in Education, 2021.**

#### Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning,

suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

Page | 32

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 4: specific safeguarding issues

This appendix is based on the advice in Annex B of Keeping Children Safe in Education. 'Keeping Children Safe in Education' 2022 identifies specific safeguarding issues.

- child-on-child abuse
- child sexual exploitation (CSE)
- child criminal exploitation (CCE)
- bullying including cyberbullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- child criminal exploitation – county lines
- honor-based abuse
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- upskirting
- teenage relationship abuse
- trafficking

Page | 33

Guidance and procedures are contained in the Oldham Safeguarding Partnership Procedures ([www.oldham.gov.uk/lscb](http://www.oldham.gov.uk/lscb)) The NSPCC offers information for schools ([www.nspcc.org.uk](http://www.nspcc.org.uk)). Broad Government guidance is provided on the GOV.UK website.

### **Child-on-child abuse**

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It **can** happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. The **can** include (but is not limited to): bullying (including cyber bullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. For further guidance on child-on-child sexual violence and sexual harassment, see KCSIE 2021, paragraphs 441 to 452.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. This abuse can be, but is not limited to, physical, sexual, financial, psychological or emotional. Children who witness domestic abuse are also victims. Witnessing domestic abuse can have a lasting impact on a child. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships

(teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

Page | 34

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group (males or females and children or adults) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve physical contact, including assault by penetration or non-penetrative acts or could be non-contact activities, including online activities. In some cases the abuse will be in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The imbalance may be due to age as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

It can involve force and/or enticement-based methods of compliance, including violence or threats of violence, humiliating and degrading sexual assaults. It can be a one-off occurrence or be a series of incidents over time and range from opportunistic to complex, organised abuse.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Victims may be being exploited even when an activity appears

consensual. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to having sex.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

Page | 35

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Have older boyfriends or girlfriends
- Suffer from sexually transmitted infections or becoming pregnant
- Display inappropriate sexualised behaviour
- Suffer from changes in emotional wellbeing
- Misuse drugs and/or alcohol
- Go missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **Child criminal exploitation: County Lines/CCE**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Children may become trapped as they or their families may be threatened with violence and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection. Children involved in CCE need to be treated as victims themselves, even though they may commit crimes. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Victims may be being exploited even when an activity appears consensual. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person under the age of 18 years;
- can affect both males and females, even though their experiences might be different;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.
- can include vehicle crime and threatening/committing serious violence

Whilst age may be the most obvious factors, this power imbalance may also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Serious violent crime**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

Page | 36

### **Sexual harassment: upskirting**

'Upskirting' typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

## **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and either:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times and will sign a visiting speaking agreement. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## Appendix 5: Online Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

Page | 40

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key categories of risk

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into the following four areas:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
  - Governors will ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
  - Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
  - Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
  - Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems and regularly review their effectiveness.
  - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

## **Appendix 6: safer recruitment and DBS checks – policy and procedures**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Page | 42

### **New staff**

Recruitment processes will follow best practice for advertising, shortlisting, interviewing and ensuring ongoing vigilance – KCSIE, 2021, paragraphs 188 to 213). Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children – following Ministry of Justice [Self-declaration guidance](#).

When appointing new staff, we will:

- Verify their identity – being aware of name changes and following best practice to check the name on their birth certificate (where available)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available – see flowchart in KCSIE 2021
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent. Further information regarding additional checks that may be 'appropriate' can be found in KCSIE 2021.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific

questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

If an individual is removed from regulated activity, a referral will be made to the DBS with as much relevant information as possible.

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are

not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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Page | 44

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

All governors will have an enhanced DBS check without barred list information, and will also have a section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008), if appropriate, i.e. for local governors if they have any delegated management responsibilities.

They will have an enhanced DBS check with barred list information if working in regulated activity.

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 7: allegations of abuse made against staff**

This section of this policy applies to all cases in which it is alleged that a current member of staff (including supply staff) or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- May have behaved in a way that indicates they may not be suitable to work with children (transferrable risk) – for example an incident outside of school which did not involve children but could have an impact on their suitability to work with children, e.g. domestic violence. Schools need to consider what triggered the actions and whether a child in school could trigger the same reaction, therefore being put at risk. In this instance an assessment of transferable risk should be undertaken.

Page | 46

It applies regardless of whether the alleged abuse took place in the school.

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

### **Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Prior to contacting the LADO (Local Authority Designated Officer), basic enquiries in line with local procedures will be carried out to establish facts - the discussion with the LADO will consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). No information about the staff member involved can be shared with other staff or parents not directly involved. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements can be put into place as described above. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is

appropriate – trade union representatives, colleague, Schools Advisory Service and Employment Assistance Programme at Oldham LA.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Page | 48

See KCSIE 2021 for detailed guidance on handling allegations against supply staff.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will

discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

#### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

#### **Confidentiality**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

#### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is found to be 'unsubstantiated, unfounded or malicious' it is the DSL who will consider the appropriate next steps. For reports found to be 'deliberately invented or malicious' it is the school that should consider possible disciplinary action in line with its behavior policy. School will remove details of allegations from personnel records, when allegations are found to be false (previously this only applied to allegations found to be 'malicious')

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for

the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Page | 50

### **Learning lessons**

After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

## **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that: Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

Page | 51

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Empowering staff to share any low-level concerns as per section 7.7 of this policy

Empowering staff to self-refer

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the school's safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

Directly to the person who raised the concern, unless it has been raised anonymously

To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. See [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#) for further guidance

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

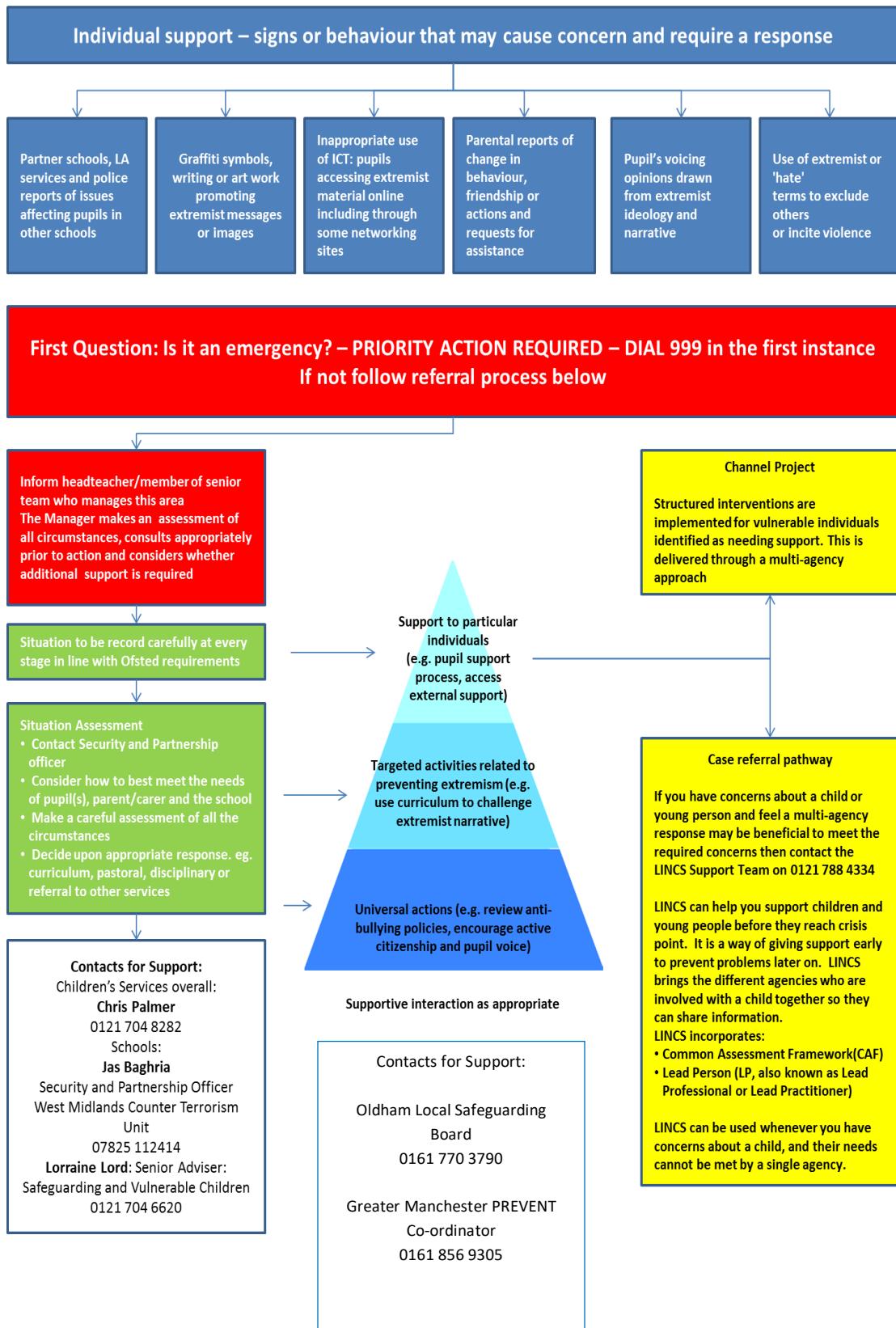
The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated;  
and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 8 – PREVENT Locally Agreed Procedures

### Preventing children and young people being drawn into extremism: how to address concerns around the welfare of an individual or groups of children and young people

Page | 53



## Appendix 9 – auditing tools in use – September 2021

### An audit tool for designated members of staff for Child Protection / SLT / Governors for auditing in school recording.

Date of Audit:

Page | 54

Completed

by:

#### **Section 1: Are case records up to date?**

From a sample of ..... (insert number) of child protection files

Child ID (eg child 1, or child A)	Date of last of recording	Comments

#### **Section 2: Is the child's voice/experience included in the record**

Area	Comments
The impact on the child is clearly recorded?	
The child's views are clearly recorded in their own words?	

#### **Section 3: Facts and professional judgements are distinguished in the record**

Area	Comments
Does the author differentiate clearly between facts and professional judgements?	
Would someone else reading the file understand the reasons/evidence underpinning professional judgements?	
Is it clear what/who the sources of information are?	

## **Section 4: File Structure**

<b>Area</b>	<b>Comment</b>
Are all entries dated and signed?	
Does the file contain a chronology of events?	
Is information repeated in more than one place in the file?	
Where information is repeated is there a clear reason for this?	
Are entries/previous files cross referenced	

**Actions/Follow up:**

**Appendix 10**  
**Checking whether the Single Central Record meets requirements**

		Fully in place	Partly in place	Not applicable	Comments
1	Is a single central record (SCR) of staff in place? Does this include all staff (even those who have only worked at the school for a day) and are staff removed when they leave?				
2	Does the SCR contain the names and addresses, dates of birth and qualifications of all members of staff?				
3	Is there evidence on the SCR that all teachers have been checked				
4	Is there evidence that all staff, who have regular contact with children employed since March 2002 (162a 2003), have been CRB/DBS checked or have sent for a CRB/DBS check if they are new to the school?				
5	Have all staff appointed since May 2006, whether or not they have regular contact with children, been CRB/DBS checked or have sent for a CRB/DBS				
6	Have new staff who have been out of the workforce, school or local authority for more than 3 months completed or sent for an enhanced CRB/DBS check?				
7	Does the SCR include evidence that supply teachers who work directly for the school have a recent CRB/DBS check and have checked their identity?				
8	Has the school evidence that agency supply teachers have been CRB/DBS checked and have checked their identity?				
9	Have volunteers who have regular (more than once a month) contact with children been CRB/DBS checked or are they never left in sole charge of children?				
10	Does the SCR record the date when the CRB/DBS check was carried out?				
11	Does the SCR record all teachers who have qualified teacher status (QTS)?				
12	Does the SCR record evidence of permission to work for those who are not nationals of a European Economic Area (EEA) country and has criminal records information been obtained (or has it been sought) from countries where individuals worked or lived?				

**Checked by:**

**Signed:**

**Date:**





